

EXHIBIT D

Re: Subpoena for Records - Savino v. Souza**Aseem Mehta** <aseem.mehta@ylsclinics.org>

Wed 6/24/2020 2:07 PM

To: Anthony Shelton (BI) <ashelton@geogroup.com>**Cc:** Michael Wishnie <michael.wishnie@ylsclinics.org>

Tony,

Thanks for your response.

We do not agree that BI's contract with ICE is a valid reason to disobey the subpoena. You have not even produced the contract language for us to review. As such, we take your email as BI's final position, such that further conferral would be futile.

Please let us know if you believe further conferral might resolve our differences.

Regards,
Aseem

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Aseem Mehta

he/him/his

Law Graduate

Jerome N. Frank Legal Services Organization

Yale Law School

aseem.mehta@ylsclinics.org

From: Anthony Shelton (BI) <ashelton@geogroup.com>**Sent:** Wednesday, June 24, 2020 10:46 AM**To:** Aseem Mehta <aseem.mehta@ylsclinics.org>**Cc:** Michael Wishnie <michael.wishnie@ylsclinics.org>**Subject:** RE: Subpoena for Records - Savino v. Souza

Aseem,

ICE has not given BI permission to provide the requested records. As discussed on our call last week, BI's contract with ICE requires BI to obtain approval prior to providing any information from the contract between BI and ICE. Because all of the information requested in the subpoena is contract information, BI will not be providing any of the requested information. My understanding is that ICE will be sending you a letter stating their position and objections for withholding the requested information, which BI adopts as it pertains to BI. I appreciate your patience while I sought a response from ICE during the past week. Please feel free to call me should you have any questions.

Regards,
Tony

From: Aseem Mehta <aseem.mehta@ylsclinics.org>**Sent:** Friday, June 19, 2020 4:28 PM**To:** Anthony Shelton (BI) <ashelton@geogroup.com>

Cc: Michael Wishnie <michael.wishnie@ylsclinics.org>

Subject: [EXTERNAL] Re: Subpoena for Records - Savino v. Souza

Sounds good. Thanks, Tony.

Regards,
Aseem

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Aseem Mehta

he/him/his

Law Graduate

Jerome N. Frank Legal Services Organization

Yale Law School

aseem.mehta@ylsclinics.org

From: Anthony Shelton (BI) <ashelton@geogroup.com>

Sent: Friday, June 19, 2020 6:23 PM

To: Aseem Mehta <aseem.mehta@ylsclinics.org>

Cc: Michael Wishnie <michael.wishnie@ylsclinics.org>

Subject: Re: Subpoena for Records - Savino v. Souza

Thank you, Aseem. I will pass this along and will reach out if we cannot meet the timeline.

Regards,
Tony

Anthony Shelton
Corporate Counsel
The GEO Group, Inc
Tel: (303) 218-1063
Mobile: (720) 788-0469

From: Aseem Mehta <aseem.mehta@ylsclinics.org>

Sent: Friday, June 19, 2020 4:16:26 PM

To: Anthony Shelton (BI) <ashelton@geogroup.com>

Cc: Michael Wishnie <michael.wishnie@ylsclinics.org>

Subject: [EXTERNAL] Subpoena for Records - Savino v. Souza

Anthony,

Thanks for taking the time to speak.

Per our conversation, we request receipt of the below listed information from your client by June 24 at 12pm. We are willing to extend the deadline for production of the remaining information in the subpoena (attached for your reference) -- the outstanding records from item 1 and all records in items 2 and 3 -- by one week, to July 1.

The information to be produced by June 24th is:

- GPS coordinate information, including all registered "hits" of GPS "violations" for the 8 individuals listed in items 1(a)-(g), and (i). The names of these individuals are:

a. Del Angel Moran, Gabino (A208-299-948), DOB: 9/27/1986

b. Mahadeo, Kavon (A059-104-840), DOB: 11/1/1985

c. Desmond, Joseph (A088-189-852), DOB: 8/2/1987

d. Vargas, Cesar (A045-456-709), DOB: 8/20/1980

e. Ferriera, Palmar (A029-514-865), DOB: 5/13/1962

f. Valentim, Lucas (A216-305-198), DOB: 9/11/1984

g. Ramirez-Maldonado, Ranferi (A205-241-005), DOB: 2/24/1981

i. Gutierrez-Deleon, Carlos (A216-305-137), DOB: 12/7/1978

- The date range for the information to be collected is April 3, 2020 to the date that the data is collected.
- The attached filings (labeled 199-2 and 218) indicate the dates that the government has alleged that these individuals registered GPS "violations" through June 8. The information produced should include all of the dates referenced by the government for each individual and be current, up to the date that the information is collected.

Thank you for your prompt attention to this matter. Please let us know if you have any questions.

Regards,
Aseem

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Aseem Mehta

he/him/his

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